

# **EXHIBIT X**

Declaration

Today, on May 31, 2023, I, [REDACTED], made and signed a declaration about my experience at the MDC with El Tigre, El Lobo, and Edgar Veytia, which I provided to the attorneys for Genaro Garcia Luna. I have done so voluntarily and of my own free will. I understand that I have every right not to sign the declaration. I can refuse if I want to. However, I am choosing, of my own free will, to make the declaration. I have not been coerced, forced, induced, to do so. I have not been offered money or any other inducement to persuade me to make and sign the declaration.

I have spoken to my attorney, Glenn Obedin, about whether or not to sign the declaration. He has advised me not to sign it. However, I wish to sign it in spite of his advice. I personally reached out to Mr. Garcia Luna's attorneys to tell them that I wish to sign the declaration, even though my lawyer advised me not to.

I hereby state that Mr. Garcia Luna's attorneys have not asked me about the circumstances of my own case. I understand that they do not represent me and they have not given me legal advice. They have also not exerted any pressure or made any promises to induce me to sign the declaration. I am doing so entirely voluntarily. The decision to do so is entirely mine.

Brooklyn, New York  
May 31, 2023

[REDACTED]

[REDACTED]

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DECLARATION OF [REDACTED]

I, [REDACTED] being duly sworn, depose and say:

1. I submit this declaration under penalty of perjury pursuant to 28 U.S.C. §1746.
2. I have been incarcerated at the Metropolitan Detention Center ("MDC") from 2017 to the present.
3. From on or about 2017 to on or about 2019, I was housed in unit 72 with Juan Carlos Nava Valencia, also known as "El Tigre."
4. I became very close with El Tigre.
5. I learned from El Tigre that he is a leader within a Mexican drug cartel and that he was continuing to coordinate drug trafficking activities while imprisoned at the MDC.
6. El Tigre is the brother of Oscar Nava Valencia, also known as "Lobo," another leader within that same Mexican drug cartel.
7. While I was housed with El Tigre, I saw that he had a contraband cell phone that he used to illegally speak with people inside and outside the jail. He also told me that he communicated with other drug traffickers through his girlfriend.
8. Specifically, El Tigre told me that he was using contraband cell phones to stay in touch with his brother Lobo, as well as someone else named Edgar, who I later learned to be Edgar Veytia.
9. I was briefly moved out of unit 72 in 2020, returning in late 2020. However, during my time in that unit, I stayed in touch with El Tigre through his girlfriend.
10. After my return, I observed that El Tigre was still in the unit. I remained close to him. I learned and/or observed that El Tigre and another drug trafficker would often speak with Lobo through contraband cell phones from 2020 to 2022.

11. In 2022, I was moved to unit 4N, where I was housed with Edgar Veytia.

12. Because of my relationship with El Tigre, I became close with Mr. Veytia.

13. Mr. Veytia told me that he was in constant contact with El Tigre and Lobo through contraband cell phones while housed in his previous MDC unit – that is the unit where he was housed before 4N.

14. While in unit 4N, because he did not have a contraband cell phone, Mr. Veytia would communicate with Mr. Veytia's mother using another inmate's Bureau of Prison minutes, telling her that she would be his "go-between" to facilitate communication between Mr. Veytia and others.

15. While housed with Mr. Veytia, I talked with him often. He spoke with me about his case. Mr. Veytia told me he had already been sentenced and that he was very upset with the length of his sentence. He told me that when he was serving his time at a different jail, he had researched the ways to reduce a sentence and had found a way to get his sentence reduced. Mr. Veytia told me that the way to reduce his sentence was to cooperate with prosecutors against Mr. Genaro Garcia Luna.

16. Mr. Veytia told me that the prosecutors in Genaro Garcia Luna's case "are stupid and will believe anything I say." I also remember Mr. Veytia telling me that he was going to testify against Mr. Garcia Luna. Specifically, as part of that conversation, Mr. Veytia said "fuck GGL, I'm going to screw him."

17. Based on my numerous conversations with El Tigre, Mr. Veytia, and the other narcotics trafficker, I understood that their plan was to do whatever they needed to do to get released from prison as soon as possible to return to their drug cartel activities. They had a plan to take over half of the cartel once they were released. They even offered me a job in the cartel.

18. I am making this declaration of my own free will. No one has coerced or forced or induced me to make this declaration.

19. I declare under penalty of perjury, that the foregoing is true and correct.

DATED: May 31, 2023  
Brooklyn, New York

  
  
BOP Reg. No. 